

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FRANCISCO PEREZ,	)	
	)	
Plaintiff,	)	No. 08 C 1009
v.	)	
	)	Judge Aspen
CHICAGO POLICE OFFICERS R. JOHNSON,	)	
STAR# 3471, M. FLORES, STAR # 7019,	)	Magistrate Judge Denlow
JOHN DOE, JOHN POE, JANE DOE and	)	
THE CITY OF CHICAGO,	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO’S AGREED MOTION  
FOR AN EXTENSION OF TIME TO ANSWER**

Defendant, City of Chicago (the “City”), by its attorney Mara S. Georges, Corporation Counsel of the City, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time until Friday, April 25, 2008, to answer to plaintiff’s Complaint. In support of this motion, the City states as follows:

1. On February 16, 2008, plaintiff filed his Complaint in the instant case against the City. The City executed waiver of service of summons on March 31, 2008. The City’s answer or responsive pleading is due on April 21, 2008.
2. This case was recently assigned to the undersigned attorneys.
3. This is the City’s first request for an extension of time. This request for an extension of time is not brought for purposes of delay, but rather to ensure that an accurate response is filed on behalf of the City.
4. In order to ensure an accurate response to plaintiff’s Complaint, further investigation will be required.
5. The City, hereby requests a five-day extension of time to answer the Complaint, to

Friday, April 25, 2008.

6. Plaintiff's counsel has been consulted and agrees to the requested extension.

Plaintiff will not be prejudiced if the requested extension of time is granted.

**WHEREFORE**, the City requests that the Court enter an order granting the City a five-day extension of time to Friday, April 25, 2008, to answer to plaintiff's Complaint.

**DATED** at Chicago, Illinois on this 21<sup>st</sup> day of April, 2008.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel of the  
City of Chicago

By: s/ Robert C. Rutherford, Jr.  
ROBERT C. RUTHERFORD, Jr.  
Assistant Corporation Counsel  
JAY M. KERTEZ  
Senior Counsel

Employment & Policy Litigation Division  
30 North LaSalle Street, Suite 1020  
Chicago, Illinois 60602  
(312) 742-7036 / (312) 744-9212

**CERTIFICATE OF SERVICE**

I certify that, on April 21, 2008, I caused a true and correct copy of **Defendant City of Chicago's Motion for an Extension of Time to Answer or Otherwise Plead** to be served on plaintiff's counsels by electronic filing.

Melinda L. Power  
Sandeep Singh Basran  
West Town Community Law Office  
2502 West Division Street  
Chicago, IL. 60622  
(773) 220-2710 \_\_\_\_\_

*s/ Robert C. Rutherford, Jr.*  
ROBERT C. RUTHERFORD, Jr.  
Assistant Corporation Counsel

Employment and Policy Litigation Division  
30 North LaSalle Street, Suite 1020  
Chicago, Illinois 60602  
(312) 742-7036